From: Clint Meyer

To: Scoping. Delta Plan@Delta Council
Subject: NOP Comments on the Delta Plan and EIR
Date: Friday, January 28, 2011 11:18:50 AM

I appreciate the opportunity the comment on the content and scope of the environmental impact report (EIR) for the Bay Delta Plan. My comments focus largely on the alternatives that should be considered in the draft EIR and the supporting technical analysis.

The Draft EIR should specifically address the following issues:

- 1. Alternatives. CEQA requires lead agencies to evaluate alternatives to the Project that demonstrate avoidance or the lessening of one or more significant environmental effects. To this end, the EIR should include an evaluation of the following alternatives in addition to those described in the NOP:
- a. A Reduced Bay-Delta Conveyance Capacity Alternative (e.g. <5,000 cubic feet per second (cfs)) with supplemental supply generated via desalination and/or indirect non-potable reuse.
- b. A Reduced CVP/SWP Contract Allocation Alternative; whereas current contract allocations are re-formulated based on actual water availability
- c. Increased Groundwater Storage North of the Delta. A comprehensive groundwater banking program in lieu of new surface storage
- 2. A Delta Plan should provide a planning horizon of at least 100 years and provide specific goals and objectives in 20 or 25-year increments. Additionally, to minimize the financial burden to rate and tax payers, improvements should be phased over a 20 year period.
- 3. The EIR should provide an analysis of the differences in power demands between a Delta Plan that includes Sites Reservoir and one that does not.
- 4. An objective of the Delta Plan should be to provide priority for water deliveries within the "Area of Origin" with secondary priority placed on export areas.
- 5. The Delta Plan must also include a plan for addressing the findings of the current CV-SALTS investigation and provide a means for controlling/reducing influx of salts/selenium from the San Joaquin Valley.

Sincerely,

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